

UNITED STATES DISTRICT COURT
 EASTERN DISTRICT OF TEXAS
 MARSHALL DIVISION

Loramax LLC, <i>Plaintiff</i> , v. Government Employees Insurance Company (d/b/a GEICO), <i>Defendant</i> .	Civil Action No. 2:15-cv-00665-RWS-RSP [UNOPPOSED MOTION]
FedEx Corporation, <i>Defendant</i> .	Civil Action No. 2:15-cv-00751-RWS-RSP
Frontier Airlines, Inc., <i>Defendant</i> .	Civil Action No. 2:15-cv-00752-RWS-RSP
JetBlue Airways Corporation, <i>Defendant</i> .	Civil Action No. 2:15-cv-00755-RWS-RSP
Porter Airlines Inc., <i>Defendant</i> .	Civil Action No. 2:15-cv-00757-RWS-RSP
WestJet Airlines Ltd., <i>Defendant</i> .	Civil Action No. 2:15-cv-00767-RWS-RSP

**[UNOPPOSED] PLAINTIFF LORAMAX'S MOTION FOR EXTENSION OF TIME TO
 RESPOND TO DEFENDANTS' § 101 MOTIONS TO DISMISS**

Plaintiff Loramax LLC ("Loramax") hereby requests that the Court enter an Order extending the deadline by two (2) days for Loramax to respond to Defendants' § 101 motions to dismiss in the above captioned cases.¹ The current deadline for each response was October 13, 2015, and the new deadline would be October 15, 2015.

Good cause exist here because, *inter alia*, the docketing clerk for Loramax counsel had calendared the deadlines in three of the matters for Monday, October, 12, 2015 and the other two for Tuesday, October 13, 2015. Lead counsel for Loramax spent much of the day Monday at the

¹ Defendants' § 101 motions are: cv-665, dkt. no. 20; cv-751, dkt. no. 17; cv-752, dkt. no. 13; cv-755, dkt. no. 14; cv-757; dkt. no. 11; and cv-767, dkt. no. 11.

dentist and also had to return to the dentist on Tuesday. It is unclear exactly how, but lead counsel for Loramax failed to see the calendar reminder for these deadlines.² On Wednesday, October, 14, 2015, lead counsel realized that these deadlines had passed and promptly notified Defendants of this oversight. Loramax intends to promptly file its response today (October 15, 2015). Defendants have confirmed that they do not oppose this two-day extension.

Accordingly, good cause exists for granting this motion. A proposed order granting this unopposed motion is attached.

DATED October 15, 2015.

Respectfully submitted,

/s/ Jaspal S. Hare
By: _____

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**ATTORNEYS FOR PLAINTIFF
LORAMAX LLC**

² Counsel for Loramax will be re-visiting its calendaring procedures and promptly putting into place procedure for having at least two sets of eyes monitoring deadlines.

CERTIFICATE OF SERVICE

I hereby certify that counsel of record who are deemed to have consented to electronic service are being served on Thursday, October 15, 2015 with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3).

/s/ Jaspal S. Hare

Jaspal S. Hare